

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

|                       |   |   |
|-----------------------|---|---|
| FIELDWOOD ENERGY LLC, | § |   |
|                       | § |   |
|                       | § |   |
| PLAINTIFFS,           | § | ADVERSARY NO. 20-03497                    |
|                       | § |   |
| v.                    | § |   |
|                       | § | Related to bankruptcy case no. 20-33948   |
| VALERO MARKETING      | § |   |
| AND SUPPLY COMPANYLLC | § | pending before the U.S. Bankruptcy Court, |
|                       | § | Southern District of Texas.               |
| DEFENDANT.            | § |   |

**AGREED MOTION TO EXTEND DEADLINES IN CASE MANAGEMENT ORDER**

The Court entered a comprehensive Case Management Order (“Order”) on February 3, 2021. *Dkt. No.* 8. The Court’s Order includes a February 25, 2021 deadline for the parties to file cross summary judgment briefs. The Court’s Order includes a March 12, 2021 deadline for the parties to file responsive brief and sets oral arguments on the summary judgments for March 24, 2021.

The ice/snowstorm of the past week has caused counsel for both parties, like nearly everyone else in Houston, significant challenges associated with loss of power and water. As consequence, the parties have effectively lost a week of preparation time on this matter and all other cases. Thus, Plaintiffs and Defendant ask for an extension of the deadlines in the Case Management Order. The Parties propose the following revised schedule:

- (i) March 9, 2021 – deadline for parties to file cross motions for summary judgment.
- (ii) March 26, 2021 – deadline for parties to file response briefs.

With respect to oral arguments, the parties ask that the Court set the summary judgment motions for oral arguments not less than 10 days after March 26, 2021.

For the reasons stated herein, the parties ask that the Court enter a revised Case Management Order to accommodate the deadlines proposed herein.

**Agreed:**

Respectfully submitted,

FERNELIUS SIMON MACE  
ROBERTSON PERDUE PLLC

By: /s/C. Robert Mace  
C. Robert Mace  
State Bar No. 12771300  
Southern District No. 1415  
bmace@trialattorneytx.com  
C. Brannon Robertson  
State Bar No. 24002852  
S.D. Tex No. 22131  
brannon.robertson@trialattorneytx.com  
Joel C. Simon  
State Bar No. 24046850  
joel.simon@trialattorneytx.com  
4119 Montrose Blvd., Suite 500  
Houston, Texas 77006  
Telephone: 713-654-1200/ Fax: 713-654-4039

**DYKEMA GOSSETT PLLC**

By: /s/Deborah D. Williamson  
Deborah D. Williamson  
State Bar No. 21617500  
dwilliamson@dykema.com  
Danielle N. Rushing  
State Bar No. 24086961  
drushing@dykema.com  
112 East Pecan Street, Suite 1800  
San Antonio, Texas 78205  
Telephone: 210.554.5500/ Fax: 210.226.8395

**ATTORNEYS FOR VALERO MARKETING  
AND SUPPLY COMPANY**

**BUCK KEENAN LLP**

By: /s/Robert L. Paddock  
ROBERT L. PADDOCK  
State Bar No. 24002723  
E. F. MANO DEAYALA  
State Bar No.00785946  
HELEN H. MCLAUGHLIN  
State Bar No. 24087706  
2229 San Felipe, Suite 1000  
Houston, Texas 77019  
(713) 225-4500 (main)  
(713) 546-2447 (direct)  
(713) 225-3719 – Facsimile  
rpaddock@buckkeen.com  
deayala@buckkeen.com  
hmclaughlin@buckkeen.com

**ATTORNEYS FOR PLAINTIFF  
FIELDWOOD ENERGY, LLC**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this Stipulation was filed with the Court's ECF filing system, which will serve copies on all counsel. I also certify that a courtesy copy of this Stipulation was sent via email to all counsel on February 19, 2021.

/s/Robert L. Paddock  
ROBERT L. PADDOCK

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

FIELDWOOD ENERGY LLC,

PLAINTIFFS,

v.

VALERO MARKETING  
AND SUPPLY COMPANY LLC

DEFENDANT.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

ADVERSARY NO. 20-03497

Related to bankruptcy case no. 20-33948

pending before the U.S. Bankruptcy Court,  
Southern District of Texas.

**ORDER GRANTING AGREED MOTION TO EXTEND DEADLINES IN CASE  
MANAGEMENT ORDER**

On this day came to be heard the Agreed Motion to Extend Deadlines in Case Management Order [*Dkt. No.* 8.] For the reasons cited in the Agreed Motion, the Court modifies the February 3, 2021 Case Management Order as follows:

- (i) March 9, 2021 – deadline for parties to file cross motions for summary judgment, which should incorporate briefing.
- (ii) March 26, 2021 – deadline for parties to file response briefs.
- (iii) April \_\_, 2021 at \_\_\_\_\_ -- oral arguments on the cross motions for summary judgment will be heard.

---

PRESIDING JUDGE